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*Attorneys for Defendant
 EMH Productions Inc. ("EMH")*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CONSTANTINO BASILE,

Plaintiff,

v.

THE LOS ANGELES FILM SCHOOL, et al.,

Defendants.

Case No.: 2:24-cv-00108-APG-MDC

ORDER GRANTING

**DEFENDANT'S MOTION TO EXTEND
 TIME TO RESPOND TO PLAINTIFF'S
 MOTION FOR DEFAULT JUDGMENT
 (ECF No. 138)**

(First Request)

Pursuant to Local Rule 6-1(a), Defendant EMH Productions Inc. ("EMH"), by and through its counsel, Pisanelli Bice PLLC, hereby moves the Court for a short extension of time to respond to Plaintiff's Motion for Default Judgment filed on April 17, 2025. ECF No. 138. This is EMH's first request.

Plaintiff initiated this action on January 16, 2024. ECF No. 1. It appears from the docket that on June 27, 2024, EMH was dismissed for lack of service. ECF No. 81. It also seems that Plaintiff was deemed to be a vexatious litigant under 28 U.S.C. § 1651(a) on October 21, 2024. ECF No. 100. The Court "enjoined and prohibited" Plaintiff from filing any new complaint, except for a claim against the City of Santa Monica. *Id.* Despite this Court's apparent limitation on filing a new complaint, Plaintiff filed an amended complaint (re)naming EMH. ECF No. 103. Plaintiff purportedly filed a proof of service related to EMH (ECF No. 132) but, to date, Plaintiff has not properly served EMH. Without proper service, Plaintiff filed a Motion for Default Judgment. ECF No. 138. Responses are currently due May 1, 2025.

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1 After learning about the pending Motion for Default Judgment, EMH retained the
2 undersigned to respond on April 29, 2025. Ex. 1: Declaration of Jordan T. Smith. In order to
3 adequately investigate the history of the case and prepare a response, EMH and the undersigned
4 request an extension of 14 days, up to and including May 15, 2025. *Id.*

5 Accordingly, EMH respectfully requests that the Court grant its Motion to Extend to
6 allow an additional 14 days to file a response to Plaintiff's Motion for Default Judgment up to
7 and including May 15, 2025.

8 Dated this 30th day of April, 2025.

9 PISANELLI BICE PLLC

10 By: /s/ Jordan T. Smith

11 Jordan T. Smith, Esq., #12097
12 Brianna Smith, Esq., #11795
13 400 South 7th Street, Suite 300
14 Las Vegas, Nevada 89101

15 *Attorneys for Defendant EMH Productions Inc.*

16 IT IS SO ORDERED:

17 Dated: May 1, 2025

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20 ANDREW P. GORDON
21 CHIEF UNITED STATES DISTRICT JUDGE
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